

4. During all times relevant to this proceeding, my hourly rate was \$325.00 per hour and Emily Krukowski's hourly rate was \$250.00 per hour. These rates are reasonable and in keeping with the rates charged by other attorneys of comparable skill and experience.

5. Attached to this Affidavit are this firm's invoices (redacted, in part) to Plaintiff for work performed in this case during November and December 2021, and a summary of the work performed during January 2022 (which will be invoiced to Plaintiff in February), as well as certain costs incurred, all as a result of Defendant Kelly Bristol's improper removal of this case to federal court. The invoices and summary were prepared based on contemporaneously-kept time records.

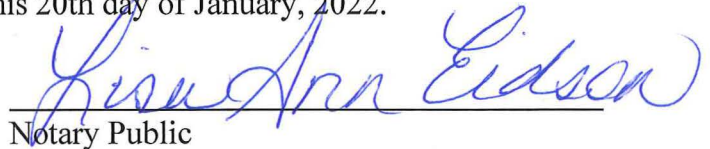
6. I have reviewed the contemporaneously-kept time records and the attached invoices, and I have determined that the work performed and hours expended were reasonable and necessary, and state that Plaintiff would not have incurred these fees and costs but for the Defendant's improper removal of the case.



Eric D. Wade

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

Subscribed and sworn to before me this 20th day of January, 2022.


Notary Public

My Commission Number: 14000727
My Commission Expires: 21 Jan 2026



Rosenstein, Fist & Ringold

525 S. Main, Suite 700

Tulsa, OK 74103-4508

Telephone No. (918) 585-9211

Facsimile No. (918) 583-5617

Internet Web Site - www.rfllaw.com

Invoice Number: 152407

Invoice Date: 12/07/2021

Activity Billed Through: 11/30/2021

Billing Attorney Initials: EDW

Christopher Avellone
[REDACTED]

Regarding: v. Kelly Bristol

Our File No.:

301821 - 0002

For professional services rendered:

				<u>Hours</u>	<u>Fees</u>
11/03/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/17/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/22/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/23/2021	EDW	238	Review Notice of Removal (.1); e-mails with C. Avellone regarding removal of case to federal court and motion for remand (.6).	0.70	227.50
11/23/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/23/2021	ECK	255	Exchange communications with E. Wade regarding research needed for issues related to removal and remand (.1); and begin researching issues related to removal and remand (.5).	0.60	150.00
11/24/2021	ECK	255	Continue research regarding issues related to removal and remand; and email to E. Wade regarding research findings.	2.00	500.00
11/29/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Total professional services:

For expenses advanced or incurred:

11/17/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/17/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/19/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/30/2021	ER		Lexis Nexis Electronic Research	93.44

Total expenses advanced:

Total billed this invoice:

Rosenstein, Fist & Ringold

525 S. Main, Suite 700

Tulsa, OK 74103-4508

Telephone No. (918) 585-9211

Facsimile No. (918) 583-5617

Internet Web Site - www.rfirlaw.com

Invoice Number: 152903

Invoice Date: 01/20/2022

Activity Billed Through: 12/31/2021

Billing Attorney Initials: EDW

Christopher Avellone
[REDACTED]

Regarding: v. Kelly Bristol

Our File No.:

301821 - 0002

For professional services rendered:

				<u>Hours</u>	<u>Fees</u>
12/02/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/10/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/12/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/13/2021	EDW	238	Conference with E. Krukowski regarding motion to remand and related procedural issues.	0.20	65.00
12/13/2021	ECK	255	Conference with E. Wade regarding motion to remand.	0.20	50.00
12/15/2021	ECK	255	Research regarding legal issues related to motion to remand and motion to stay.	1.60	400.00
12/16/2021	EDW	238	Conference with E. Krukowski re: motion for remand and motion to stay.	0.60	195.00
12/16/2021	ECK	255	Conference with E. Wade re: arguments for motions to remand and stay deadlines pending remand determination (0.6); draft motion to stay briefing on motion to dismiss and request for judicial notice pending motion to remand (1.7).	2.30	575.00
12/17/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/17/2021	ECK	255	Draft motion to remand.	4.20	1,050.00
12/20/2021	EDW	238	[REDACTED] (.1); revise motion to remand and for award of costs and attorney fees with combined brief in support (2.7); e-mails with C. Avellone regarding questions about and revisions to motion to remand (.2).	3.00	975.00
12/21/2021	ECK	255	Research re: grounds for recovery and fees (.6); finalize draft motion in preparation for filing (.3).	0.90	225.00

Please pay this amount:

**Summary of Work Performed
between January 1, 2022 and January 20, 2022**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Time</u>	<u>Amount</u>
1/3/22	EDW	E-mails with Scott Kiplinger and Chris Avellone re. possible stipulation on remand and amount of Plaintiff's attorney fees and costs incurred as a result of improper removal.	.10	\$32.50
1/11/22	EDW	E-mails with Chris Avellone re. impending deadline for Defendant to respond to motion to remand.	.10	\$32.50
1/13/22	EDW	Review Court's Order granting Motion to Remand (.1); e-mails with Chris Avellone re. order and application for fees (.3).	.40	\$130.00
1/19/22	EDW	E-mails with Scott Kiplinger re. possible stipulation on amount of fees and costs (.2); e-mails with Chris Avellone re. possible stipulation (.1).	.30	\$97.50
1/20/22	EDW	E-mails with Chris Avellone re. offering to reduce fees and costs sought (.3); e-mails with Scott Kiplinger transmitting Plaintiff's reduced offer, and review Defendant's rejection of same (.1); prepare Application for Attorney Fees and Costs (.8); prepare supporting affidavit and documentation for Application (1.0); e-mails with C. Avellone re. Application (.1).	2.30	\$747.50
TOTAL			3.20	\$1,040.00